

THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
GENOA COLOR TECHNOLOGIES, LTD.,	)
	)
Plaintiff,	)
	)
v.	) Civil Action No. 07-CIV-6233 (PKC)(JHP)
	)
MITSUBISHI ELECTRIC CORP.;	)
MITSUBISHI ELECTRIC US HOLDINGS, INC.)	)
MITSUBISHI ELECTRIC AND	)
ELECTRONICS USA, INC.;	) <b>AFFIDAVIT OF LEE A. GOLDBERG IN</b>
MITSUBISHI DIGITAL ELECTRONICS	) <b>SUPPORT OF MOTION TO ADMIT</b>
AMERICA, INC.; SAMSUNG	) <b>COUNSEL PRO HAC VICE</b>
ELECTRONICS CO., LTD.; SAMSUNG	)
ELECTRONICS AMERICA, INC.	)
	)
Defendants.	)
-----X	

FILED  
 U.S. DISTRICT COURT  
 2007 AUG 16 PM 3:16  
 S.D. OF N.Y.

Lee A. Goldberg, being duly sworn, hereby deposes and says as follows:

1. I am a member of Pearl Cohen Zedek Latzer, LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Sibley P. Reppert as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in June 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Sibley P. Reppert since 2006.
4. Mr. Reppert is a member of Lahive & Cockfield, LLP in Boston, Massachusetts.
5. I have found Mr. Reppert to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Attached hereto as Exhibit 1 is a certificate of good standing of Sibley Reppert.
6. Accordingly, I am pleased to move the admission of Sibley P. Reppert, pro hac vice.

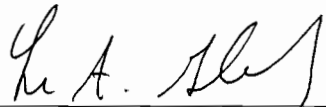
624/51 \$25  
 8-16-07

7. I respectfully submit a proposed order granting the admission of Sibley P. Reppert, pro hac vice, which is attached hereto as Exhibit 2.

WHEREFORE it is respectfully requested that the motion to admit Sibley P. Reppert, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: August 3, 2007

New York, New York

  
\_\_\_\_\_  
Lee A. Goldberg (LG-9423)

Sworn and subscribed before me this 3<sup>rd</sup>  
day of August, 2007.

  
\_\_\_\_\_  
Notary Public

**Danielle A. Gordon**  
**Notary Public, State of New York**  
**No. 02GO6113460**  
**Qualified in Nassau County**  
**Commission Expires August 2, 2008**

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Plaintiff,	)
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v.	) Civil Action No. 07-CIV-6233 (PKC)(JHP)
	)
MITSUBISHI ELECTRIC CORP.;	)
MITSUBISHI ELECTRIC US HOLDINGS, INC.)	)
MITSUBISHI ELECTRIC AND	)
ELECTRONICS USA, INC.;	) <b>MOTION TO ADMIT COUNSEL</b>
MITSUBISHI DIGITAL ELECTRONICS	) <b>PRO HAC VICE</b>
AMERICA, INC.; SAMSUNG	)
ELECTRONICS CO., LTD.; SAMSUNG	)
ELECTRONICS AMERICA, INC.	)
	)
Defendants.	)
-----X	

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Lee A. Goldberg a member in good standing of the bar of this Court, hereby move for an Order in the above matter allowing the admission pro hac vice of:

Sibley P. Reppert  
Lahive & Cockfield, LLP  
One Post Office Square  
Boston, MA 02109-2127  
Tel: (617) 994-0830  
Fax: (617) 742-4214

Mr. Reppert is a member in good standing of the Bar of the State of Massachusetts.

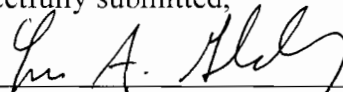
There are no pending disciplinary proceedings against Sibley P. Reppert in any State or Federal court.

In support of this motion and filed concurrently herewith this motion is the Affidavit of Lee A. Goldberg in Support of Motion to Admit Counsel Pro Hac Vice and the Proposed Order for Admission Pro Hac Vice on Written Motion.

Dated: August 3, 2007

New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lee A. Goldberg", is written over a horizontal line.

Lee A. Goldberg, Esq. (LG-9423)  
Pearl Cohen Zedek Latzer LLP  
1500 Broadway, 12<sup>th</sup> Floor  
New York, New York 10036  
Tel: (646) 878-0814  
Fax: (646) 878-0801

## COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **nineteenth** day of **December** A.D. **1975**, said Court being the highest Court of Record in said Commonwealth:

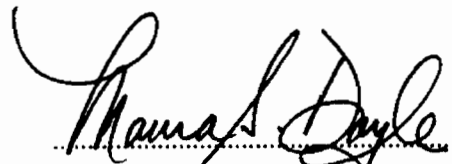
**Sibley P. Reppert**

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **nineteenth** day of **July**  
in the year of our Lord **two thousand and seven**.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

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SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,	)	
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v.	)	Civil Action No. 07-CIV-6233 (PKC)
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MITSUBISHI ELECTRIC CORP.;	)	
MITSUBISHI ELECTRIC US HOLDINGS, INC.)	)	
MITSUBISHI ELECTRIC AND	)	
ELECTRONICS USA, INC.;	)	<b>[PROPOSED] ORDER FOR ADMISSION</b>
MITSUBISHI DIGITAL ELECTRONICS	)	<b>PRO HAC VICE ON WRITTEN MOTION</b>
AMERICA, INC.; SAMSUNG	)	
ELECTRONICS CO., LTD.; SAMSUNG	)	
ELECTRONICS AMERICA, INC.	)	
	)	
	)	
Defendants.	)	
-----X	)	

Upon the motion of Lee A. Goldberg attorney for Genoa Color Technologies, Ltd. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Sibley P. Reppert  
Lahive & Cockfield, LLP  
One Post Office Square  
Boston, MA 02109-2127  
Tel: (617) 994-0830  
Fax: (617) 742-4214

is admitted to practice pro hac vice as counsel for Genoa Color Technologies, Ltd. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: August 16, 2007

New York, New York

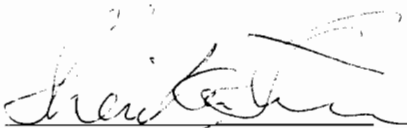
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Hon. P. Kevin Castel  
U.S.D.J.

## CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing **MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT OF LEE A. GOLDBERG IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE and PROPOSED ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION** was made this 16<sup>th</sup> day of August, 2007, by delivering a true and correct copy of the same by Federal Express Priority Overnight to the following:

1. Vincent J. Belusko  
Morrison Foerster  
555 West 5<sup>th</sup> Street  
Los Angeles, CA 90013-1024
2. Scott LaScala  
Mitsubishi Electric US Holdings, Inc.  
Corporate Trust Company  
1209 Orange Street  
Wilmington, DE 19801
3. Margaret Wilson  
CT Corporation  
818 W 7<sup>th</sup> Street  
Los Angeles, CA 90017
4. Philip A. Irwin  
Covington & Burling LLP  
The New York Times Building  
620 Eight Avenue  
New York, NY 10018



Sherika A. Sterling